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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as
successor in interest to BENJAMIN
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
MARISOL BARAJAS; HECTOR
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

Assigned to:

Hon Mark C. Scarsi

Hon. Mag. Judge Karen L. Stevenson

JOINT EXHIBIT LIST

Final Pretrial Conference:

Date: January 26, 2026

Time: 2:00 p.m.

Crtrm: 7C

Trial:

Date: February 10, 2026

TO THE HONORABLE COURT:

Plaintiff Jennie Quan and Defendants County of Los Angeles, Marisol Barajas, and Hector Vazquez, by and through their respective counsel of record, hereby submit their Joint Exhibit List pursuant to the Court's Order re: Jury/Court Trial.

DATED: January 5, 2026

LAW OFFICES OF DALE K. GALIPO

By /s/ Hang D. Le

Dale K. Galipo

Hang D. Le

Attorneys for Plaintiff

DATED: January 5, 2026

HURRELL CANTRALL LLP

By /s/ Jerad J. Miller*

Thomas C. Hurrell

Janet J. Hur

Jerad J. Miller

Attorneys for Defendant, County of Los Angeles

*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur with the filing's content and have authorized the filing.

PLAINTIFF'S EXHIBITS

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
1	Bodyworn Camera Video of Hector Vazquez (COLA 00855)			
2	Bodyworn Camera Video of Marisol Barajas (COLA 00854)			
3	Synced video of shots from Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
4	Synced and stabilized video of shots from Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
5	Synced video of Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
6	Synced and stabilized video of Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
7	Frame-by-frame of synced video of shots from Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
8	Frame-by-frame of synced video of Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
9	Frame-by-frame of synced and stabilized video of Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
10	Synced video of Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
11	Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
12	Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
13	Synced video of Vazquez and Barajas's BWCs, with audio sourced from Barajas's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
14	Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
15	Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Barajas's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
16	Bodyworn Camera Video from Deputy German Perez (COLA 00856)			
17	Bodyworn Camera Video from Deputy Chad Holland (COLA 00857)			
18	Bodyworn Camera Video from Deputy Kyle Toves (COLA 00858)			
19	Bodyworn Camera Video from Deputy Sotelo, J. (COLA 00859)			
20	Bodyworn Camera Video from Deputy Carlos De La Torres (COLA 00882)			

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
21	Bodyworn Camera Video capturing ambulance transportation of Benjamin Chin to the hospital (COLA 00853)			
22	Radio Traffic from Dispatch 6 (COLA 00887) (ID Only)			
23	Radio Traffic from Walnut L-Tac (COLA 00889)			
24	Radio Traffic from Walnut Metro (COLA 00891)			
25	Audio Recording of Interview of Deputy Hector Vazquez (COLA 00752) (ID Only)			
26	Transcript of Interview of Deputy Hector Vazquez (COLA 01021-01039) (ID Only)			
27	Audio Recording of Interview of Deputy Marisol Barajas (COLA 00755, 0756, 0757) (ID Only)			

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
28	Transcript of Interview of Deputy Marisol Barajas (COLA 00971-00998) (ID Only)			
29	Audio Recording of Interview of Deputy Chad Holland (COLA 00748) (ID Only)			
30	Transcript of Interview of Deputy Chad Holland (COLA 00918-00931) (ID Only)			
31	Audio Recording of Interview of Deputy Christopher Bronowicki (COLA 00749) (ID Only)			
32	Transcript of Interview of Deputy Christopher Bronowicki (COLA 1001-1016) (ID Only)			
33	Audio Recording of Interview of Deputy German Perez (COLA 00750) (ID Only)			

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
34	Transcript of Interview of Deputy German Perez (COLA 00932-00952) (ID Only)			
35	Audio Recording of Interview of Deputy Kyle Toves (COLA 00753) (ID Only)			
36	Transcript of Interview of Deputy Kyle Toves (COLA 00955-00967) (ID Only)			
37	Audio Recording of Interview of Deputy Carlos De La Torres (COLA 00746) (ID Only)			
38	Transcript of Interview of Deputy Carlos De La Tores (COLA 00901-00914) (ID Only)			
39	Photographs of Deputy Marisol Barajas after the incident (COLA 00315-00321)			

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
40	Los Angeles County Fire Department Emergency Medical Services Record of Benjamin Chin	Defendants' objections: Fed. R. Evid. 801; hearsay		
41	Medical Records of Benjamin Chin from Pomona Valley Hospital Medical Center (PLT 00273-314)	Defendants' objections: Fed. R. Evid. 801; hearsay		
42	County of Los Angeles Autopsy Report of Benjamin Chin (PLT 00002-00034)	Defendants' objections: Fed. R. Evid. 801; hearsay		
43	Selected Autopsy Photos of Benjamin Chin (PLT 00323 (redacted), 326, 328, 330, 380 (redacted), 388, 389 (redacted), 390 (redacted), 392 (redacted), 394, 396, 409 (redacted), 410 (redacted))	Defendants' objections: Fed. R. Evid. 403, 801; relevance; hearsay; unduly prejudicial		
44	Cancelled Check from Benjamin Chin to Jennie Quan (PLT 00037)	Defendants' objections: Fed. R. Evid. 403, 801; relevance; hearsay; unduly prejudicial		

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
45	Benjamin Chin Bachelor of Science Diploma from Cal Poly Pomona (PLT 00038-39)	Defendants' objections: Fed. R. Evid. 403, 801; relevance; hearsay; unduly prejudicial		
46	Photographs of Benjamin Chin and Benjamin Chin with Family (PLT 00040-85)	Defendants' objections: Fed. R. Evid. 403; relevance; unduly prejudicial		
47	Jennie Quan Kaiser Permanente Therapy Records (PLT 00086-00272)	Defendants' objections: Fed. R. Evid. 403; relevance; unduly prejudicial		
48	BWC Still Shots from Marisol Barajas Deposition			
49	BWC Still Shots from Hector Vazquez Deposition			
50	Exhibits 50-100 reserved for Plaintiff			

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DEFENDANTS' EXHIBITS

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
101.	Incident Report (COLA 00006 – 00016)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
102.	J. Sotelo Supplemental Report (COLA 00017 – 00019)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
103.	J. Segura Supplemental Report (COLA 00020 – 00022)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
104.	S. Granados Supplemental Report (COLA 00021 – 00023)	Fed. R. Evid. 802, hearsay for which there is no exception.		
105.	Detective Han (COLA 00024 – 00025)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
106.	R. Suarez Jr. Supplemental Report (COLA 00036 - 00037)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
107.	LASD Supplemental Report (COLA 00041 – 00075)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
108.	Witness Interview Summaries (COLA 00076 – 00079)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
109.	Prior Mental Health Incidents (COLA 00080 – 00082)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
110.	Benjamin Chin DMV Report (COLA 00088 – 00104)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
111.	Examination of Evidence (COLA 00107 – 00141)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
112.	March 7, 2019 Incident & Supplemental Report (COLA 00142 – 00154)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
113.	Benjamin Chin's Restraining Order (COLA 00155 – 00193)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
114.	June 17, 2023 Incident Report (COLA 00201 – 00210)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
115.	Vergel Sandifer Audio Interview (COLA 00745)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
116.	Syed Razvi Audio Interview (COLA 00744)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
117.	Janet Johansen Audio Interview (COLA 00742)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
118.	Brandon Wiseman Audio Interview (COLA 00741)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
119.	Marisol Barajas Body-Worn Camera (COLA 00854)			

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
120.	Hector Vazquez Body-Worn Camera (COLA 00855)			
121.	German Perez Body-Worn Camera (COLA 00856)			
122.	Chad Holland Body-Worn Camera (COLA 00857)			
123.	Kyle Toves Body-Worn Camera (COLA 00858)			
124.	J. Sotelo Body-Worn Camera (COLA 00859)			
125.	Christopher De La Torre Body-Worn Camera (COLA 00882)			
126.	Body-Worn Camera of Plaintiff's Treatment After Stabbing (COLA 00291)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant.		
127.	Video of Benjamin Chin Stabbing Plaintiff (COLA 00818)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/waste of time if relevant.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
128.	Benjamin Chin Lifting Rifle in Neighborhood (COLA 00835)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/waste of time if relevant.		
129.	Benjamin Chin Walking Around Neighborhood (COLA 00758; 00832 - 00833)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/waste of time if relevant.		
130.	Hospital Body-Worn Camera (COLA 00294; 00297 – 00298; COLA 00300 – 00303)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/waste of time if relevant.		
131.	LASD Policies (COLA 00328 – 00479)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
132.	Benjamin Chin Journal/Documentary Evidence (COLA 00480 – 00740)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/waste of time if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
133.	Witness and Deputy Audio Interviews (COLA 00741 – 00835)	Plaintiff's objections: Fed. R. Evid. 403, cumulative, prejudicial; Fed. R. Evid. 802, hearsay for which there is no exception.		
134.	Dispatch Audio (COLA 00887 - 00888)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
135.	L-TAC Audio (COLA 00889 – 00890)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
136.	Walnut Station Audio (COLA 00891 – 00892)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
137.	Dispatch, L-TAC and Walnut Station Audio Details (COLA 00893 – 00900)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/waste of time if relevant; Fed. R. Evid. 802, hearsay for which there is no exception.		
138.	Hector Vazquez Interview Transcript (COLA 01021 – 01039)	Fed. R. Evid. 802, hearsay for which there is no exception.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
139.	Marisol Barajas Interview Transcript (COLA 00971 – 00998)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
140.	Chad Holland Interview Transcript (COLA 00918 – 00931)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
141.	Christopher Bronowicki Interview Transcript (COLA 1001 – 1016)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
142.	Carlos De La Torre Interview Transcript (COLA 00901 – 00914)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
143.	German Perez Interview Transcript (COLA 00932 – 00952)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
144.	Kyle Toves Interview Transcript (COLA 00953 – 00967)	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
145.	Autopsy Report	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		

Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
146.	County of Los Angeles Fire Department Records	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
147.	Benjamin Chin's Pomona Valley Hospital Records	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
148.	John Marehbian, MD Expert Report	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
149.	Joel Suss Expert Report	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
150.	Ed Flosi Expert Report	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		
151.	Parris Ward Expert Report and Synchronized Videos	Plaintiff's objections: Fed. R. Evid. 802, hearsay for which there is no exception.		